

# **EXHIBIT E**

## **AFFIDAVIT OF WALLACE RAKESTRAW**

STATE OF TEXAS  
COUNTY OF HARRIS

BEFORE ME, the undersigned authority, personally appeared WALLACE RAKESTRAW, known to me to be the person whose name is subscribed to this Affidavit, and who, upon first being duly sworn by me, did under oath depose and say:

1. My name is Wallace "Wally" Rakestraw. I am over 18 years old and have never been convicted of a felony. I am of sound mind and I am fully competent to give this affidavit under oath. The facts contained within this affidavit are within my personal knowledge or have been derived from a review of AISD business records and are true and correct.
2. I am employed by Alief Independent School District as its Director of Desktop Computing and Network Services, and I am the highest-ranking administrator in this Department. I ultimately supervise all employees within the Department of Desktop Computing and Network Services.
3. I am aware of a lawsuit filed by a current AISD employee, Nhuong Truong, alleging that the District discriminated against him on the bases of his race (Asian-American) and his national origin (Vietnamese), and that the District retaliated against him for having allegedly complained internally of discrimination. I deny that I discriminated against or retaliated against Mr. Truong in any manner, and I am unaware of any AISD employee having done so.
4. Mr. Truong is currently employed as a Hardware Service Technician within the Department that I supervise. Ken Cintron is Mr. Truong's direct supervisor in the Department. Mr. Truong's primary job goals, as set forth in his job descriptions, are to repair PC and Macintosh computers, to execute repairs using timing and cost efficient methods, to solve equipment defects swiftly and cost-effectively, and to be responsible for

repairing all technology equipment after certification is achieved.

5. It is my understanding that Mr. Truong alleges that AISD gave preferential treatment to white employees in promotion decisions, including when AISD upgraded Brian Pilgreen to the Manager of Network systems position in 2013. This is not true. I initially recommended that AISD hire Mr. Pilgreen for the position of Campus Technical Support Specialist during the 2003-2004 school year, after Mr. Pilgreen applied and interviewed for that position. Mr. Truong did not apply for this position, and he had never indicated to me that he was interested in the position. For the following school year, AISD posted a vacancy for a LAN Tech Support Specialist, and Mr. Pilgreen submitted an application for this position. I interviewed the candidates for the LAN Tech Support Specialist position, and upon completion of the interview process, I recommended that the District hire Mr. Pilgreen for the position. Mr. Truong did not submit an application for the LAN Tech Support specialist position.
6. Over the course of Mr. Pilgreen's employment with the District, his duties and responsibilities regarding the District's network services continued to grow. Eventually, I determined that Mr. Pilgreen's responsibilities had increased to the point that an upgrade of his position was not only fair, but necessary. I concluded that the District's network operations were experiencing an incredible rate of change and growth, and that the number of current responsibilities and systems supported has exceeded the capacity of the current network team of two network admins. Therefore, on February 22, 2013, I submitted a request to upgrade Mr. Pilgreen's position to Manager of Network Services. I also submitted a request that the District create two Network Support Specialist positions which would report directly to Mr. Pilgreen as the supervising manager. The District approved my requests to upgrade Mr. Pilgreen's position and to create two subordinate positions beginning with the 2013-2014 school year. As this position was never a vacancy but was created as an upgrade to Mr. Pilgreen's then-current position, I did not receive any applications for this position. I am also unaware of Mr. Truong having ever expressed any interest in managing the District's network services.

7. Mr. Pilgreen had already demonstrated his qualifications for the Manager of Network Systems position during his tenure as a LAN Tech Support Specialist, including coding, designing, and implementing networks and security measures District-wide. Mr. Pilgreen also has a bachelor's degree from Baylor University, thus meeting the "required" qualification of holding a bachelor's degree for the Manager of Network Services position. To the contrary, Mr. Truong has exclusively performed maintenance and repair work on AISD's computer-related hardware since his initial employment in 1987, and I am unaware of Mr. Truong having ever performed any work related to coding, designing, or implementing the District's network and security systems or troubleshooting software and network-related computer issues in AISD in his role as a hardware technician. Further, I am unaware of Mr. Truong having ever obtained a bachelor's degree in any field. Mr. Pilgreen's position prior to his upgrade required him to perform work related to network security and software applications, which Mr. Truong has never performed for the District and has never demonstrated the requisite skills to perform. I do not believe that Mr. Truong was similarly qualified to Mr. Pilgreen for the Manager of Network Systems position at the time that Mr. Pilgreen's position was upgraded in light of their vastly different job duties and job titles as well as their disparate educational and professional backgrounds and work experiences. Accordingly, Mr. Truong would not have been qualified for the Manager of Network System position even if it was a position for which he could have applied.
8. It is my understanding that Mr. Truong complains that after he filed his first charge of discrimination on or about August 16, 2013, he was not promoted to a Senior Campus Technical Support Specialist position. AISD has not had any vacancies for a Senior Campus Technical Support Specialist position since August of 2013, and it necessarily follows that the District has not hired anyone for this position in the relevant period of time. In any event, a bachelor's degree is a required qualification for any candidate for a Senior Campus Technical Support Specialist position. It is my understanding that Mr. Truong does not possess a bachelor's degree and, therefore, Mr. Truong would not have been a qualified candidate for a Senior Campus Technical Support Specialist position even if such a position had been available in the timeframe of which Mr. Truong complains.

9. I also understand that Mr. Truong also alleges that in addition to not being promoted to a Senior Campus Technical Support Specialist position that was not available, he was not selected to be promoted to any other position after he filed his charge of discrimination in August of 2013. Fifteen (15) posted positions have been filled in the Department since August of 2013. Specifically, AISD filled six Campus Technical Support Specialist positions, four Network Support Specialist positions, three Help Desk Support Specialist positions, one General Technician position, and one Hardware Repair Technician position (the same position that Mr. Truong holds with the District). Seven of these vacancies were filled internally with candidates whom were already employees of AISD, and all such employees submitted requests to be considered for these specifically posted positions. Truong did not apply for any of the fifteen (15) posted positions that were filled in the Department after he filed his charge of discrimination in August of 2013.
10. Neither the Senior Campus Technical Support Specialist position (which was not an available position) nor any of the positions described above that AISD filled after August 16, 2013, are considered managerial or “supervisory” positions because these positions do not entail the supervision of other, subordinate employees.
11. Due to my employment as the Director of Desktop Computing and Network Services for AISD, I am aware of AISD’s Board Policies and procedures, and I have personal knowledge regarding certain documents maintained by AISD in its normal course of business. Attached hereto are pages of records from AISD. These pages are kept by AISD in the regular course of business, and it was the regular course of business of AISD for an employee or representative of AISD, with knowledge of the act, event, condition, opinion, or diagnosis, recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter. The records attached hereto are exact duplicates of the original.

Exhibit E-1 – Hardware Service Technician Job Description

Exhibit E-2 – Mr. Pilgreen’s Employment Application

Exhibit E-3 – Technology Personnel Recommendation

Exhibit E-4 – Technology Personnel Recommendation

Exhibit E-5 – Upgrade Position Memorandum

Exhibit E-6 – Personnel Change Summary

Exhibit E-7 – Desktop Computing and Network Services Department Organizational Chart

Exhibit E-8 – Manager of Network Services Job Description

Exhibit E-9 – Department Job Postings for positions filled since August 16, 2013

Exhibit E-10 – Internal requests and applications for transfer for posted positions filled since August 16, 2013

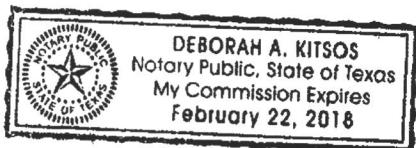
Exhibit E-11 – Mr. Truong’s June 11, 2014 Manual Trades Evaluation

12. I have read this affidavit and it is true and correct and all statements therein are within my personal knowledge.

FURTHER AFFIANT SAYETH NOT.

*Wallace Rakestraw*  
WALLACE RAKESTRAW

SUBSCRIBED and SWORN TO before me by the said Wallace Rakestraw on the  
10 day of March 2016.



*Deborah A. Kitsos*  
Notary Public in and for the State of Texas

# **EXHIBIT E-1**

56200  
BUS/Tech Services  
Manual Trades MT14  
Non-exempt

**TITLE:** Hardware Service Technician

**QUALIFICATIONS:** Associate's degree in a computer related field or recent hardware repair certification concerning late model PC/Macintosh computers and VCR/TVs. Minimum experience of three years in a field repairing late model computers. Background in electronics and repair of electronics. Speaking English only is a requirement of this job. This regulation will ensure effective communication during emergencies and discussion of assignments, work performance, and work rules. The regulation is not applicable during breaks, lunch time, and any other time not directly related to the performance of job duties and emergencies.

**REPORTS TO:** Hardware Service Manager

**JOB GOAL:** To repair PC and Macintosh computers. To execute repairs using timely and cost efficient methods. To solve equipment defects swiftly and cost-effectively. To be responsible for repairing all technology equipment after certification is achieved.

**PERFORMANCE RESPONSIBILITIES:**

1. Attends and passes all district financed certification courses/tests.
2. Performs all equipment repairs scheduled by hardware service manager.
3. Performs all preventative maintenance duties scheduled.
4. Keeps abreast of most recent computer software that the district utilizes at the operating system level as well as BIOS configurations.
5. Applies analytical problem solving skills according to technical reference manuals to solve equipment failures in a time and cost-efficient manner.
6. Performs component and board level repairs as prescribed by hardware service manager.
7. Assists in installations of new equipment as directed.
8. Maintains necessary toolsscopes/test equipment necessary for repairs of technology equipment that the district chooses to repair in-house.
9. Installs/repairs equipment in timely manner as prescribed by hardware service manager.
10. Performs all system hardware enhancements/upgrades as directed.
11. Performs other duties as assigned by hardware service manager.

**EVALUATION:** Performance of this job will be evaluated in accordance with provisions of the Board's policy on evaluation of classified personnel.

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Employee Signature

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Date

Revised: March 2001

# **EXHIBIT E-2**



**Educational Background**

Write different name(s) used. This information is needed for documentation/identification.

High School	Midland High School	Location	Midland, Texas		
College/University	Location	Dates Attended	Major	Minor	Type Degree
Baylor University		1983 - 1991	Religion	Psychology	B.A.
Houston Community College		1999 - 2000	Course Credit	Computer Systems	None

**Certification/License Information**

Circle Yes or No to respond to each statement below. If you respond "yes" to any statement, provide additional information as indicated. Also, include supporting documents when application is returned.

Yes	No	I have teacher certification or I have the appropriate license/certificate for a non-teaching position. If yes, include a copy of your certificate or license (front and back if appropriate). Provide information about your certification/license below. <b>IMPORTANT:</b> Temporary permits/certificates, substitute certificates, or city-issued certificates are not acceptable teaching credentials in Texas.				
		Type of license or certificate	Teaching Field or Area of License	Issue Date	Expiration Date	State

Complete this section only if you have Texas teacher certification.

Has your employment with any Texas school district caused you to be placed on a permit or one year certificate?

Yes \_\_\_\_\_ No \_\_\_\_\_

Yes	No	I am currently student teaching or I have just completed student teaching. If yes, send a copy of your most recent transcript. An original transcript with the degree posted is required if hired. Proposed area of certification _____
Yes	No	I have been accepted in an alternative certification program. If yes, provide information below. Also, include a copy of your acceptance letter from the alternative certification program. Name of program _____ Proposed area of certification _____
Yes	No	I have been accepted in a university intern program. If yes, provide information below. Also, include a copy of your acceptance letter from the alternative certification program. Name of program _____ Proposed area of certification _____
Yes	No	I will work to obtain certification through a college-based program (deficiency plan). If yes, you must obtain a deficiency plan from a Texas college/university. Include a copy of your deficiency plan. You may be eligible for an emergency permit. Have you obtained a deficiency plan? Yes _____ No _____ College/university providing deficiency plan _____ Proposed area of certification _____

**Student Teaching Experience** Complete this section only if you have no prior full time teaching experience.

Dates From: Mo Yr To: Mo Yr				Name of School/School District	Location	Cooperating Teacher	Grade/Subject Taught

**Professional Educational Experience** Include full time teaching, school administrative experience, and professional support experience. Beginning with most recent experiences first, list all professional educational experience. Attach an additional sheet if needed.

Dates From: Mo Yr To: Mo Yr				Total # of years	School/school district and location (city, state) Principal/supervisor and telephone number (including area code)	Grads or Subject Taught

**Non-teaching Experience** List, in order, all non-teaching experience beginning with most recent experiences.

Dates From: Mo Yr To: Mo Yr				Your position or job title	Company/Employer Supervisor and telephone number (including area code)
11	2000	Present		Network Administrator	Tracix Systems - Chris Gill 210-363-4455 210-256-7080
12	1993	11	2000	Program Director	Buckner Children and Family Services - Randy Daniels 214-758-8000
03	1998	11	2000	Consultant/Contractor	Complete Computer Solutions - Randy Welch 281-238-8761 832-754-8053

**List three references** Include administrators and principals or supervisors under whom you have taught or worked and to whom you are well known. Student teachers should list name of cooperating teacher(s) and university supervisors.

**NOTE:** Former and current administrators and principals or supervisors may be contacted for reference purposes.

Name, position/title Institution/school district and location (city, state)	Current Phone Number (including area code)
Chris Gill - Network Manager - Tracix Systems - San Antonio, Texas	210-363-4455 210-256-7080
Randy Daniels - Program Director - Buckner Children and Family Services, Dallas, Texas	214-758-8000
Randy Welch - Owner - Complete Computer Solutions - Sugar Land, Texas	281-238-8761 832-754-8053

Recent graduates only: A current placement file can be used instead of the reference forms supplied with the application. Applicants must have placement folders sent to us. Alief ISD does not request placement folders.

**General Information**

Briefly tell why you want to work in the Alief Independent School District.

I am looking to obtain a position within a service-oriented organization working with professionals who enjoy supporting customers, reaching milestones, and achieving goals.

Have you ever been terminated, non-renewed, or asked to resign by an employer or school district? Yes  No

If yes, please give name of employer or school district, and the reason(s) for termination, non-renewal, or the request for resignation.

Have you ever been convicted of any crime other than a minor traffic violation? Yes  No

If yes, please explain including the date and place of arrest and the nature of the charges.

Have you ever been convicted of a felony or any crime involving moral turpitude?\* Yes  No

If answer is yes, please explain.

Have you ever been convicted of a felony or any offense involving moral turpitude and received probation? Yes  No

If the answer is yes, please explain.

Has any court ever received a plea of guilty or no plea (nolo contendere) from you for any offense? Yes  No

If yes, please explain.

Has any court ever deferred proceedings without entering a finding of guilty, and placed you on probation?\*\* Yes  No

If yes, please explain.

Has any court ever placed you on probation for any offense?\*\* Yes  No

If yes, please explain.

\* Moral turpitude is defined as an act of baseness, vileness or depravity in the private and social duties in which a person owes another member of society or society in general and which is contrary to the accepted rules of right and duty between persons. Crimes involving moral turpitude include, but are not limited to theft, attempted theft, murder, rape, swindling, and indecency with a minor.

\*\* The district will review the nature of the offense, the date of the offense, and the relationship between the offense and the position for which the person is applying before making a determination concerning impact upon consideration for employment.

In signing this application, I hereby declare that the information provided by me in connection with my application, whether on this document or not, is true and complete to the best of my knowledge and belief. I understand that any misrepresentation, falsification of facts or failure to disclose information shall be sufficient cause for disqualification of this application and, if I am hired, sufficient cause for me to be terminated from employment. Furthermore, it is understood that this application and records become the property of the District, which reserves the right to accept or reject it. I further agree to observe all rules, regulations, and policies of the District if employed. Alief ISD is given authorization to contact the references and employers listed in this application and release them from any liability and responsibility arising from their doing so. I understand that in accordance with state law, school districts may obtain a criminal record of all applicants for employment and that the Texas Department of Public Safety and/or other law enforcement agencies may be contacted to provide records.

Signature of Applicant

Date

7-16-03

**Alief Independent School District**  
**Professional Applicant Reference Form**

**Applicant:** Provide complete information in this area. Distribute form(s) to most current principal or supervisor. Alief ISD does not mail forms to person providing reference. For recent graduates only, a current placement file can be submitted instead of reference forms. (The applicant must have placement folder sent to Alief ISD.)

**APPLICANT'S NAME** Pilgree Brian Edward  
 Last First Middle

**SS #** \_\_\_\_\_ **POSITION(S) DESIRED** Desktop and Network Services

I have applied for employment in the Alief Independent School District for the position indicated above. I hereby authorize you to give full and complete information below as requested by Alief ISD. In compliance with Texas Open Records Law, and the Federal Education Rights and Privacy Act of 1974, I will be allowed to see this form upon written request.

**Applicant's Signature** B. C. **Date** 7-16-03

Supervisor or Principal: Complete this section for ALL applicants. Indicate your evaluation of the person named above by marking the appropriate indicator.						
Characteristics	Clearly Outstanding	Exceeds Expectations	Meets Expectations	Below Expectations	Unsatisfactory	No Basis to Judge
Appearance		X				
Punctuality	X					
Dependability	X					
Professional Judgment	X					
Response to Supervision		X				
Enthusiasm		X				
Commitment	X					
Rapport with Peers	X					
Communicates Clearly		X				
Supervisor or Principal: Complete this section only if person is applying for Teaching/Instructional position(s).						
Knowledge of subject matter						
Selection of appropriate objectives						
Uses variety of instructional methods						
Handles discipline matters fairly and consistently						
Maintains positive classroom climate						
Works well as a part of an instructional team						
Effective human relation skills with students						
Effective human relation skills with parents						
Probable success as a teacher						

Supervisor or Principal: Complete the section below for ALL applicants.

Indicate your relationship to the applicant. Principal Asst. Principal Cooperating Teacher  University Supervising Teacher

Supervisor Coworker Personal Acquaintance College Professor Other \_\_\_\_\_

I have known applicant 9 years months (circle one).

In considering this person for a position, I would  employ without looking further  consider strongly  not consider for employment.

Check here if using back of page for additional comments. \_\_\_\_\_

Signature Mark Lampe Name (please print) Mark Lampe  
 Company/School District University of the Incarcerated World Position Instructor, School of Business, UIW  
 Telephone Number (210) 599-3399 (210) 353-4210 Date July 16, 2003

Thank you for providing reference information. Please return form directly to Alief ISD Personnel Services, 12302 High Star, Houston, TX 77072 or FAX to 281/988-3465 or phone 281/988-3456, Toll Free 877-887-2473, extension 3456.

**Alief Independent School District**  
**Professional Applicant Reference Form**

**Applicant:** Provide complete information in this area. Distribute form(s) to most current principal or supervisor. Alief ISD does not mail forms to person providing reference. For recent graduates only, a current placement file can be submitted instead of reference forms. (The applicant must have placement folder sent to Alief ISD.)

**APPLICANT'S NAME** Pilgreen **First** Brian **Middle** Edward  
**Last**

**SS #** \_\_\_\_\_ **POSITION(S) DESIRED** Desktop and Network Services

I have applied for employment in the Alief Independent School District for the position indicated above. I hereby authorize you to give full and complete information below as requested by Alief ISD. In compliance with Texas Open Records Law, and the Federal Education Rights and Privacy Act of 1974, I will be allowed to see this form upon written request.

**Applicant's Signature** B. Pilgreen **Date** 7-16-03

**Supervisor or Principal:** Complete this section for ALL applicants. Indicate your evaluation of the person named above by marking the appropriate indicator.

Characteristics	Clearly Outstanding	Exceeds Expectations	Meets Expectations	Below Expectations	Unsatisfactory	No Basis to Judge
Appearance		X				
Punctuality	X					
Dependability	X					
Professional Judgment	X					
Response to Supervision		X				
Enthusiasm	X					
Commitment	X					
Rapport with Peers		X				
Communicates Clearly	X					

**Supervisor or Principal:** Complete this section only if person is applying for Teaching/Instructional position(s).

Knowledge of subject matter						
Selection of appropriate objectives						
Uses variety of instructional methods						
Handles discipline matters fairly and consistently						
Maintains positive classroom climate						
Works well as a part of an instructional team						
Effective human relation skills with students						
Effective human relation skills with parents						
Probable success as a teacher						

**Supervisor or Principal:** Complete the section below for ALL applicants.

Indicate your relationship to the applicant. Principal Asst. Principal Cooperating Teacher University Supervising Teacher

Supervisor Coworker Personal Acquaintance College Professor Other \_\_\_\_\_

I have known applicant 6 years months (circle one).

In considering this person for a position, I would ✓ employ without looking further consider strongly not consider for employment.

Check here if using back of page for additional comments. \_\_\_\_\_

Signature Brandon Welch Name (please print) Brandon "Randy" Welch  
 Company/School District Alief Independent School District Position PC Technician

Telephone Number (281) 498-8110 Ext. 2532 Date 7-22-03

Thank you for providing reference information. Please return form directly to Alief ISD Personnel Services, 12302 High Star, Houston, TX 77072 or FAX to 281/988-3455 or phone 281/988-3456, Toll Free 877-887-2473, extension 3456.

**Alief Independent School District  
Professional Applicant Reference Form**

**Applicant:** Provide complete information in this area. Distribute form(s) to most current principal or supervisor. Alief ISD does not mail forms to person providing reference. For recent graduates only, a current placement file can be submitted instead of reference forms. (The applicant must have placement folder sent to Alief ISD.)

**APPLICANT'S NAME** Brian Edward Pilgree  
 Last Brian First Edward Middle Pilgree

SS #   **POSITION(S) DESIRED**Desktop and Network Services

I have applied for employment in the Alief Independent School District for the position indicated above. I hereby authorize you to give full and complete information below as requested by Alief ISD. In compliance with Texas Open Records Law, and the Federal Education Rights and Privacy Act of 1974, I will be allowed to see this form upon written request.

Applicant's Signature Brian Edward PilgreeDate 7-16-03

Supervisor or Principal: Complete this section for ALL applicants. Indicate your evaluation of the person named above by marking the appropriate indicator.						
Characteristics	Clearly Outstanding	Exceeds Expectations	Meets Expectations	Below Expectations	Unsatisfactory	No Basis to Judge
Appearance	<input checked="" type="checkbox"/>					
Punctuality	<input checked="" type="checkbox"/>					
Dependability	<input checked="" type="checkbox"/>					
Professional Judgment	<input checked="" type="checkbox"/>					
Response to Supervision	<input checked="" type="checkbox"/>					
Enthusiasm	<input checked="" type="checkbox"/>					
Commitment	<input checked="" type="checkbox"/>					
Rapport with Peers	<input checked="" type="checkbox"/>					
Communicates Clearly	<input checked="" type="checkbox"/>					
Supervisor or Principal: Complete this section only if person is applying for Teaching/Instructional position(s).						
Knowledge of subject matter						
Selection of appropriate objectives						
Uses variety of instructional methods						
Handles discipline matters fairly and consistently						
Maintains positive classroom climate						
Works well as a part of an instructional team						
Effective human relation skills with students						
Effective human relation skills with parents						
Probable success as a teacher						

Supervisor or Principal: Complete the section below for ALL applicants.

Indicate your relationship to the applicant.  Principal  Asst. Principal  Cooperating Teacher  University Supervising Teacher Supervisor  Coworker  Personal Acquaintance  College Professor  Other \_\_\_\_\_I have known applicant 10 years months (circle one).In considering this person for a position, I would  employ without looking further  consider strongly  not consider for employment.Check here if using back of page for additional comments. Signature Chris Guil Name (please print) Chris GuilCompany/School District Trajen Systems Position Network ManagerTelephone Number 210-365-4455 Date 7-13-03

Thank you for providing reference information. Please return form directly to Alief ISD Personnel Services, 12302 High Star, Houston, TX 77072 or FAX to 281/988-3455 or phone 281/988-3456, Toll Free 877-887-2473, extension 3456.

Brian stands head and shoulders above his peers. He has a passion for computers and technology.

In addition, his character and integrity are the "extras" that set him apart.

# **EXHIBIT E-3**



PREPARING STUDENTS FOR TOMORROW — CARING FOR THEM TODAY

TO: Rose Hernandez  
Associate Superintendent  
Human Resources

FROM: Wally Rakestraw *Wally*  
Director of Desktop Computing and Network Services  
Technology Services

DATE: October 6, 2003

SUBJECT: Technology Personnel Recommendation

I would like to make the following recommendation for one of our technology positions recently posted through Human Resources:

Brian Pilgreen for the position of "Campus Technical Support Specialist" effective October 20, 2003. This is an AM10-220 day position and we would like to offer at a salary of \$40,500 annually.

C. Woods

*C. Woods*

900-1  
111  
111

711 549

15, 2003  
4/15/03  
5/10/03

*rk - R. Hernandez*  
10/8/03

54900  
BUS/Tech Services  
Professional AM10  
Exempt

**TITLE:** Campus Technical Support Specialist

**QUALIFICATIONS:** Bachelor's degree in a computer related field. Three years of experience in providing technical support for varying types of technologies which include: PC's, Macintoshes, video systems. Knowledge of instruction related software and its uses. Speaking English only is a requirement of this job. This regulation will ensure effective communication during emergencies and discussion of assignments, work performance, and work rules. The regulation is not applicable during breaks, lunch time, and any other time not directly related to the performance of job duties and emergencies.

**JOB GOAL:** To act as the first line of assistance for all campus issues relating to technology. To assist administration as well as the teacher in the daily maintenance of all computers/video systems and other technologies. To ensure that the campuses always designate a staff member to be the first (and last) contact regarding problems related to technology.

**REPORTS TO:** Manager of Campus Technical Support

**PERFORMANCE RESPONSIBILITIES:**

1. Assists campuses in resolving technology related problems, including desktop computers, file servers, networks, video systems.
2. Provides the first line contact between the campus personnel and specialized support by technology services.
3. Assists in the direction of unresolved problems to the appropriate manager and queue in technology services.
4. Maintains detailed records of all requests and problem resolutions.
5. Maintains detailed fixed asset records of campus technology.
6. Provides a solution to all PC/Macintosh related problems or inquiries by hand-on resolutions or by obtaining assistance.
7. Assists with installations of new technology each year.
8. Performs equipment transfers from one person to another including any software transfers (i.e., computers handed down).
9. Performs other duties as assigned by manager of campus technical support.

**EVALUATION:** Performance of this job will be evaluated in accordance with provisions of the Board's policy on evaluation of professional personnel.

  
Employee Signature

10-27-03  
Date

Revised: March 2001

# **EXHIBIT E-4**

TO: Rose Hernandez  
Associate Superintendent  
Human Resources

FROM: Wally Rakestraw *Wally*  
Director of Desktop Computing and Network Services  
Technology Services

DATE: June 21, 2004

SUBJECT: Technology Personnel Recommendation

I would like to make the following recommendation for one of our technology positions recently posted through Human Resources:

Brian Pilgreen for the position of "LAN Tech Support Specialist" effective June 28, 2004. This is an AM11-235 day position and we would like to offer at a salary of \$50,500 annually.

C. Woods



OK / R. Hernandez S  
u/22/04

711552

# **EXHIBIT E-5**

# PERSONNEL REQUEST FORM

## MEMO

To: Superintendent/Superintendent's Council

From: Wally Rakestraw

Date: 2/22/13

RE: Position Request

       **New Position:** \_\_\_\_\_

# of positions \_\_\_\_\_ Pay Grade: \_\_\_\_\_ Number of Days: \_\_\_\_\_

X **Upgrade Position:** Network Administrator, LAN to *Manager Network Services*

From Pay Grade: AM13 To Pay Grade: AM14

       **Change in # of Days for Position:** \_\_\_\_\_

From \_\_\_\_\_ To: \_\_\_\_\_

Rationale for request (attach additional information if necessary):

- This area of our district technology, Network Operations, is experiencing an incredible rate of change and growth. The number of current responsibilities and systems supported has exceeded the capacity of the current network team of 2 network admins. Leadership with additional responsibility is needed in order to support the number of existing systems as well as to develop the necessary support staff and processes.
- This position would provide necessary leadership, supervision, coordination, and project management in all network operations and related network staff activities.
- Serves as the highest level of leadership and responsibility regarding networking technical resources in the department.
- Responsible for managing and supervising all network design, engineering and support activities.

**Please note: A job description must be attached if the request is for a new position or an upgrade to an existing position.**

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Approved: \_\_\_\_\_ Denied: \_\_\_\_\_

cc: Human Resources  
Requesting Department  
Deanna Wentz

**Proposed**  
BUS/Tech Services  
Professional AM14 235-day  
Exempt

**TITLE:** Manager of Network Services

**QUALIFICATIONS:** The Network Manager will have a Bachelor's degree (required) in Computer Science or an equivalent field (preferred) from an accredited university. The candidate should have experience in project management, team leadership, and supervising staff in a fast paced, enterprise network environment. The person should be able to share vision and research emerging technologies as they apply to a rapidly changing k-12 environment. The Network Manager will supervise teams responsible for design, deployment, and maintenance of all district networking technology systems. The candidate should be competent with networking technology including but not limited to: WINS, DNS, DHCP, DFS, TCP/IP, Routing, Internet Access, E-Mail services and Windows Networking. The candidate should be knowledgeable of Unix/Linux and PC's (both DOS/Windows and Macintosh) as well as Novell, Windows Server, Active Directory, Routing protocols and network media. The successful candidate will have a thorough understanding of network protocols and Client/Server technologies, SQL, firewalls, network security systems, enterprise management systems, and network architecture.

**JOB GOAL:** The Network Manager will supervise and coordinate the activities and processes regarding the acquisition, deployment, support, maintenance and monitoring of all district network services and operations. This will include but is not limited to: network design projects, network transport projects, authentication services, mobile services, wireless services, security services, systems monitoring, DNS, DHCP, WINS, DFS, TCP/IP, Windows Servers, Active Directory, Electronic Mail, Routing protocols and schemes, Internet Connectivity and Client/Server applications.

**REPORTS TO:** Director of Desktop Computing and Network Services

**PERFORMANCE RESPONSIBILITIES:**

1. Supervise the design, implementation, management and support of all networks and server related systems and processes.
2. Oversee changes and improvements to the district networks and systems which includes submitting a yearly budget for such changes to Director of Desktop Computing and Network Services.
3. Manage a network team of personnel responsible for providing design, deployment, maintenance and configuration of networking services in Alief ISD.
4. Organize all Network Training classes with the guidance of the Director Desktop & Network Services. This might include actually teaching the network classes.
5. Direct diagnosis and repair of all network related problems that arise regarding network based technology. This includes working with the Network Administrators, to resolve LAN and WAN related problems.
6. Perform other duties as assigned by Director of Desktop Computing and Network Services.

**WORKING CONDITIONS:**  
All campuses are temperature controlled with hard surface floors. Job requires physical mobility, standing, prolonged sitting, lifting, carrying, pushing, and pulling (10 pound minimum). Job may also require climbing stairs, stooping, bending and reaching over head. Working conditions may be modified under the Americans with Disabilities Act (ADA) for diagnosed medical conditions.

**EVALUATION:** Performance of this job will be evaluated in accordance with provisions of the Board's policy on evaluation of professional personnel.

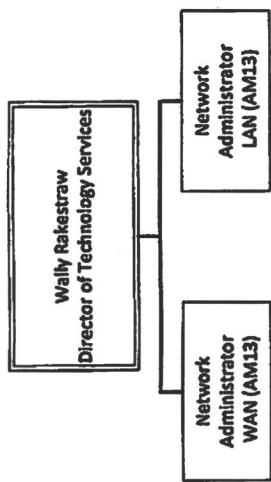
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Employee Signature

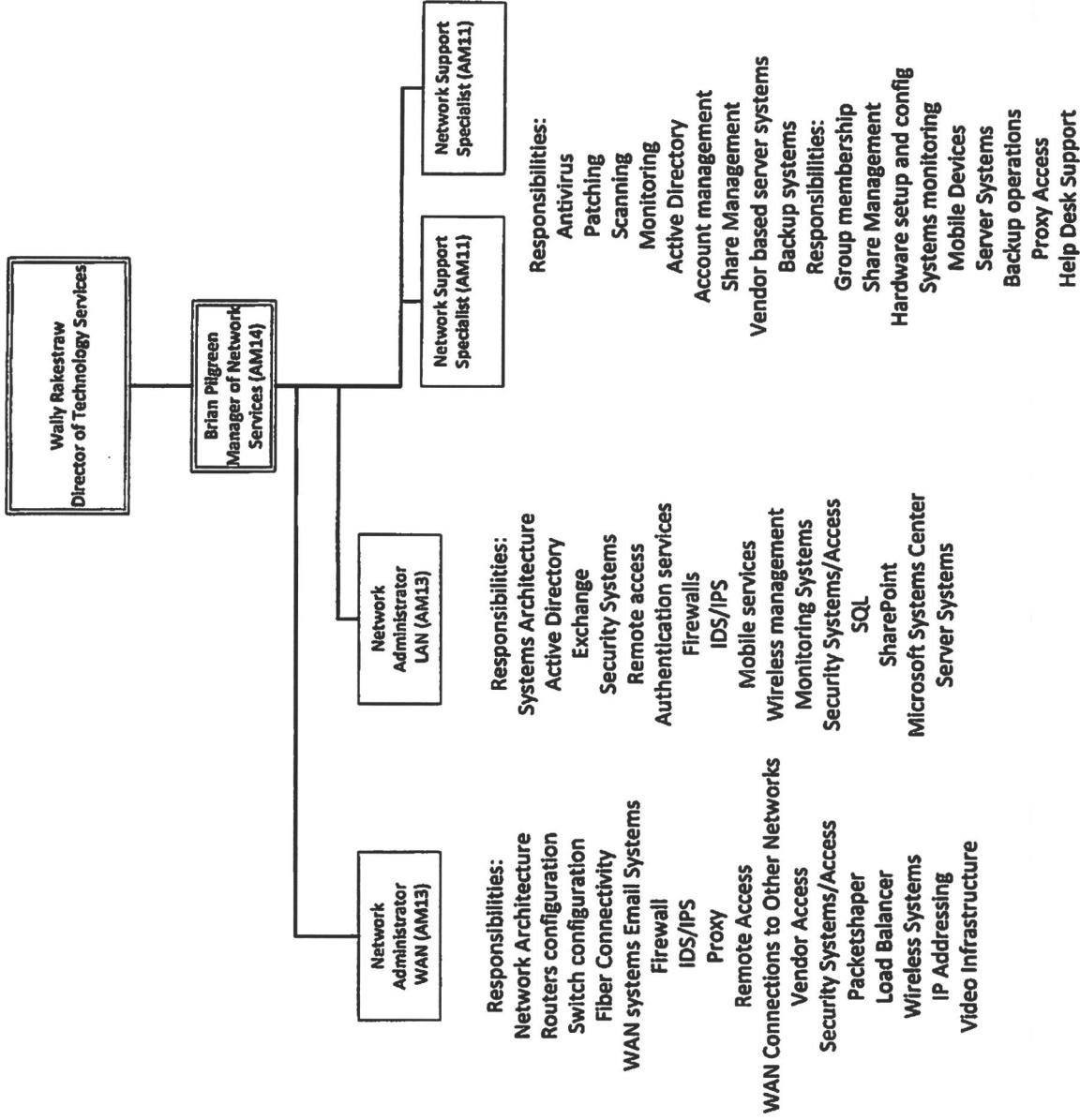
Date

Revised: February 2013

## Current Team Structure



## Proposed Team Structure



# **EXHIBIT E-6**

## Personnel Change Summary

### General Fund

#### Campus Based Position Changes

##### New Positions:

Elementary Specialists	4.0	\$ 184,000	Approved 4/16
Intermediate Specialists	2.0	92,000	Approved 4/16
MS Fine Arts Teacher	6.0	275,000	Approved 4/16
HS Fine Arts Teacher	3.0	155,000	Approved 4/16
HS CTE teachers	3.0	138,000	Approved 4/16
College/Career Access Counselor	4.0	255,000	
Parent Liaisons	5.0	117,000	
Instructional Technology Integrators	3.0	138,000	
Itinerant REID Teachers	2.0	92,000	
SOAR Curriculum Specialist	1.0	48,000	
ALC Hall Monitor	1.0	23,000	
Campus Support Techs	2.0	122,000	
<b>Ratio Based Changes:</b>			
Special Ed Teachers	(9.0)	(423,000)	
Special Ed Paras	18.0	423,000	
High School Teachers	4.0	184,000	19.5:1 - 9th; 22:1 - 10-12
Middle School Teachers	6.0	276,000	19:1
Elementary Teachers	(5.5)	(253,000)	22:1
Intermediate Teachers	1.0	46,000	24:1
Elementary Counselors	2.0	126,000	Campuses over 1,000
Elementary Paraprofessionals	2.0	46,000	Standard ratios
ESL Lead Teachers	1.0	46,000	YB - Inc In LEP
<b>Total Campus Based Changes</b>	<b>55.5</b>	<b>2,110,000</b>	

##### Central Instructional Support positions -

Area Superintendent	1.0	135,000	Approved 4/16
Fine Arts Facilitator/Assistant	1.0	47,000	Approved 4/16
Family & Community Engagement Coordinator	1.0	77,000	
College and Career Readiness Facilitator	1.0	64,000	
Accountability Coordinator	1.0	77,000	
Pregnancy Related Services Program Manager	1.0	46,000	
Spec Ed Coordinators: Already reduced - Adjust to filled units	(3.0)	(210,000)	
Lead Instructional Facilitator - Spec Ed	1.0	54,000	
Reading/Math Facilitator - Spec Ed	2.0	95,000	
<b>Total Central Instructional Support position changes</b>	<b>6.0</b>	<b>385,000</b>	

**Business Services positions -**

MIS Database Specialist	1.0	68,000	<i>Approved 4/16</i>
Purchasing Buyer	(1.0)	(38,000)	
Purchasing Assistant	(1.0)	(33,000)	
Network Support Specialist	2.0	122,000	
School Bus Driver	7.0	99,000	
<b>Total Business Services position changes</b>	<b>8.0</b>	<b>218,000</b>	
 <b>Total Staffing Plan Position Changes</b>	 <b>69.5</b>	 <b>2,713,000</b>	

**Other Changes:**

Upgrades	232,972
Day Changes	101,476
Stipends	5,600
<b>Total Other Changes</b>	<b>340,048</b>

**TOTAL - General Fund** 69.5 \$ 3,053,048

**Federal**

Assistant Supervisor - Nutrition	3.0	133,998
Compliance Coordinator	1.0	77,367
<b>TOTAL- Federal Funds</b>	<b>4.0</b>	<b>211,365</b>
 <b>Grand Total Staffing Plan Changes</b>	 <b>73.5</b>	 <b>3,264,413</b>

**Other New Positions - Priority 2:**

Data Manager	1.0	\$ 29,000
Elementary Social Studies Coordinator	1.0	77,000
<b>Total Priority 2</b>	<b>2.0</b>	<b>\$ 106,000</b>

**Upgrades:**

Police officer to corporal	1.0	\$ 2,656
LVN Salary upgrade	24.0	183,000
Bookkeeper II	1.0	4,566
Purchasing Secretary	1.0	3,494
Purchasing Clerk	1.0	1,968
Crafts II - Kitchen	1.0	2,215
Crafts II - Carpentry	1.0	5,803
Groundskeeper	1.0	4,139
Application Programmer	2.0	6,014
Police Dispatch Supervisor	1.0	1,904
Technology Services Secretary	1.0	2,757
Lead Mechanic	2.0	4,430
Data Analysis Facilitator	1.0	3,403
Network Administrator	1.0	3,631
Assistive Technology Specialist	1.0	2,992
	<b>40</b>	<b>232,972</b>

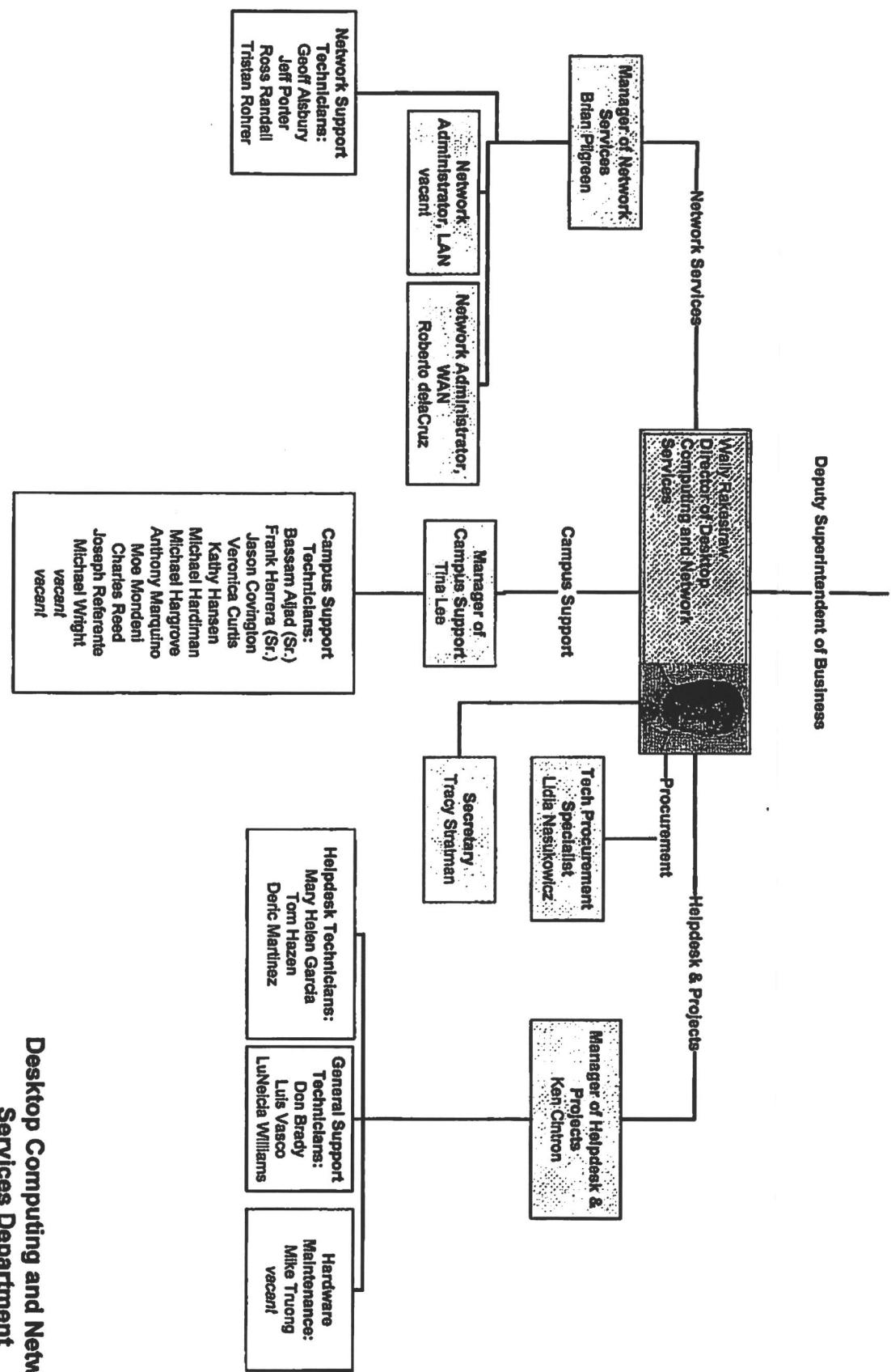
**Day Changes:**

SOAR Aide: Upgrade & increase days	1.0	5,864
ALC workroom Aide: Upgrade & increase days	1.0	2,623
MS Asst Principal: Increase days	17.0	28,774
PASS Specialists: Increase days	5.0	21,455
Revenue Recovery Specialist: Upgrade & increase days	3.0	31,169
Educational Diagnostician: Increase days	1.0	311
SLP Coordinator: Increase days - no upgrade	1.0	11,280
	<b>29</b>	<b>101,476</b>

**Stipends:**

MS Lead Counselor	6.0	3,600
Doctoral Stipend for Asst. Supts.	2.0	2,000
	<b>8</b>	<b>5,600</b>

# **EXHIBIT E-7**



## Desktop Computing and Network Services Department

PC and Network Support, Servers, Switching, Internet, Email, Web Servers, Security

# **EXHIBIT E-8**

56900  
BUS/Tech Services  
Professional AM14  
Exempt

**TITLE:** Manager of Network Services

**QUALIFICATIONS:** Bachelor's degree (required) in computer science or an equivalent field (preferred) from an accredited university. Experience in project management, team leadership, and supervising staff in a fast paced, enterprise network environment. Competency in networking technology including but not limited to WINS, DNS, DHCP, DFS, TCP/IP, Routing, Internet Access, E-Mail services, and Windows Networking. Knowledgeable of Unix/Linux and PCs (both DOS/Windows and Macintosh) as well as Novell, Windows Server, Active Directory, Routing protocols and network media. Thorough understanding of network protocols and Client/Server technologies, SQL, firewalls, network security systems, enterprise management systems, and network architecture.

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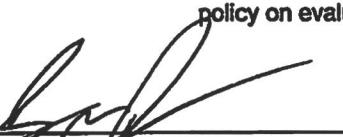
**REPORTS TO:** Director of Desktop Computing and Network Services

**PERFORMANCE RESPONSIBILITIES:**

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**EVALUATION:** Performance of this job will be evaluated in accordance with provisions of the Board's policy on evaluation of professional personnel.

  
Employee Signature

  
Date

New: February 2013